

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
RECEIVED SOUTHERN DIVISION

JOWELL S. NUNN,

Plaintiff,

v.

GREG WARD,

Defendant.

2007 MAY 11 AM 9:41

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CASE NO: 1 : 06 Cv 452 -MEF

(WO)

MOTION FOR PRODUCTION OF DOCUMENT FROM FILE OF JAILED
INMATE IN REGARD TO PLAINTIFF CLAIMS AS ALLEGED IN
INITIAL COMPLAINT OF PLAINTIFF SUPPORTING PLAINTIFF CONTENTIONS
OF DELIBERATE INDIFFERENCE TO PLAINTIFF

Comes Now, Plaintiff, Jowell Nunn, pro se in the above styled cause and petitions this Honorable Court to enter a Order to the named defendant to Produce the below requested document in support of the Initial complaint of the Plaintiff initial complaint in the above styled case. As grounds for the issuance of said Order petitioner states the following :

- (1) The said document requested is of substantial nature relevant to the claim presented in the instant action initiated by the plaintiff that if this court enter an order of production of said document, it will aide in the plaintiff showing of deliberate indifference, and that the Defendant in the plaintiff's actions knowingly, and deliberately failed to adhere to the Rule of the Jail Standard Operation Procedures, and the defendant recklessly endangerment of the named defendant, and other(s) housed in the jail safety, and welfare of their health.
- (2) The said document is of substantial nature to the said case that plaintiff seeks to have it compelled by the defendant and entered into evidence in support of his allegations that the defendants acted deliberately in the

maintaining of the plaintiff and other inmates welfare in order to adequately seek medical attention for a bacteria infection (staph) located in the jail.

(3) Plaintiff seeks to have a "affidavit" from the County jail administration or Booking Room of inmate Dennis Rudd which plaintiff and several other inmates signed and had notarized stating that the Sheriff (Defendant) Ward acted with gross negligence, deliberately in segregating Inmate Rudd from the rest of the inmates after repeated notices of the inmate had a (staph infection)

CONCLUSION

Wherefore plaintiff, seeks this Honorable Court to Issue an **ORDER** compelling the named Defendant to produce the requested document to which the plaintiff is seeking to have enclosed as evidence to his claim that the defendant acted with deliberate indifference as alleged by plaintiff.

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on all parties by way of prepaid mail herein the Ventress Correctional Facility on this the 9th day of May 2007 by placing a copy of the same in the Institutional Mail box.



Howell S. Nunn
Ventress Correctional Facility
P.O. Box 767
Clayton, Alabama 36016

NAME

JOWELL NUNN

204088
AIS #E4
DORM #

VENTRESS CORRECTIONAL FACILITY

P. O. BOX 767

Clayton, AL 36016

MONTGOMERY AL 361

10 MAY 2007 PM 1 L



MIDDLE DISTRICT OF ALABAMA
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